



Tuesday, March 25, 2003

Richard H. Karney, P.E., Manager  
ENERGY STAR Program  
Building Technologies Program

Richard,

Atrium Windows & Doors would like to commend you and your staff for all the hard work and effort that has preceded the proposed changes for the ENERGY STAR Program, however we would like to express our concerns before final approval is given and the final criteria is issued. As a manufacturer of both Aluminum and Vinyl Residential Windows we would like to ask for consideration of the following:

- We support the proposed changes to the "U"-Factors and Solar Heat Gain Coefficients (SHGC), so long as the current boundaries of the present ENERGY STAR map do not change.
- The current boundaries of the present ENERGY STAR map and its regions are consistent with those regions set forth by the International Energy Conservation Code 2000 (IECC). The proposed changes to the "U"-Factors and Solar Heat Gain Coefficients by the ENERGY STAR Program would create a higher standard for those regions than is required by the IECC.
- The ultimate consumer in the marketplace and the home building trade is already informed, educated, and familiar with the current three-boundary ENERGY STAR map. To have to re-educate and market a new map is simply not needed at this time.
- As a final point we would like to re-enforce the stated ENERGY STAR Program criteria, which is to promote; energy efficiency, commercial availability, cost effectiveness, and performance in the marketplace. Relative to product performance, we believe that making vinyl the only ENERGY STAR alternative in harsh, hot Southwestern climates (where the material has not been proven out in the "real world") is a risky proposition that could damage the credibility of the ENERGY STAR program long term. In line with these considerations we propose no changes to the boundaries of the present ENERGY STAR map. Given acceptance of the proposed U-Factor and SHGC changes, with modest performance enhancing product changes, manufacturers can supply to the marketplace the ENERGY STAR residential windows that are most suited and proven in those markets while accomplishing the objective of dramatically improving the energy efficiency of new homes.

Thanks for your consideration in this matter.

Jeff Hull, CEO & President  
Atrium Companies Inc.